

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

INDIGO WILLIAMS,
on behalf of her minor child J.E., et al.

PLAINTIFFS

v.

CIVIL ACTION NO: 3:17-cv-404

GOVERNOR PHIL BRYANT et al.

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

COME NOW Defendants, Gov. Phil Bryant, Speaker of the Mississippi House of Representatives Phillip Gunn, Lieutenant Gov. Tate Reeves, Secretary of State Delbert Hosemann, State Superintendent of Education Carey Wright, Chair of the Mississippi State Board of Education Rosemary Aultman, Mississippi State Board of Education Member Jason Dean, Mississippi State Board of Education Member Buddy Bailey, Mississippi State Board of Education Member Kami Bumgarner, Mississippi State Board of Education Member Karen Elam, Mississippi State Board of Education Member Johnny Franklin, Mississippi State Board of Education Member Williams Harold Jones, Mississippi State Board of Education Member John Kelly, and Mississippi State Board of Education Member Charles McClelland (collectively, “State Defendants”), and file their Motion for Extension of Time to Answer and/or Otherwise File a Responsive Pleading as follows:

1. Plaintiffs filed the instant Complaint against the State Defendants on May 23, 2017. *See Complaint, Docket Entry No. [1]*. The State Defendants’ response to this Complaint currently is due on June 13, 2017.

2. Due to prior obligations and time constraints of counsel for the State Defendants, the State Defendants requests a forty-one (41) day extension of time, until July 24, 2017, to

answer or otherwise respond to Plaintiffs' Complaint. This motion is not made for purposes of delay, but instead to allow the State Defendants time to adequately respond to the forty-one page Complaint.

3. Counsel for Plaintiffs has been contacted regarding the instant motion and does not object to the extension.

4. Given the nature of this motion, the State Defendants request that the requirement of a separate memorandum in support be waived.

For these reasons, the State Defendants request an extension of time, up to and including July 24, 2017, by which to answer or otherwise respond to Plaintiffs' Complaint.

Respectfully submitted this the 7th day of June, 2017.

**BY: JIM HOOD, ATTORNEY GENERAL
STATE OF MISSISSIPPI**

BY: /s/ Krissy C. Nobile
Krissy C. Nobile, MSB # 103577
STATE OF MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL
Post Office Box 220
Jackson, MS 39205
Telephone No. (601)359-3824
Facsimile: 601-359-2003
knobi@ago.state.ms.us

Counsel for the State Defendants

CERTIFICATE OF SERVICE

This is to certify that on this day I, Krissy C. Nobile, electronically filed the foregoing document with the Clerk of the Court using the ECF system, which sent notice to all counsel of record.

THIS the 7th day of June, 2017.

/s/Krissy C. Nobile
KRISSEY C. NOBILE